

MELINDA HAAG (CABN 132612)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

THOMAS MOORE (ALBN 4305-O78T)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7017  
FAX: (415) 436-7009

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 14-00131 JST
	)	
Plaintiff,	)	STIPULATION REGARDING PROTECTIVE
	)	ORDER AND <del>proposed</del> ORDER THEREON
v.	)	
	)	
PAUL LAMONT LEE,	)	
	)	
Defendant.	)	

The parties stipulate as follows:

1. Defendant Paul Lamont Lee ("Defendant") was charged with 18 U.S.C. § 286 – Conspiracy to File False Claims, 18 U.S.C. § 287 – False Claims, and 18 U.S.C. § 1028(a)(7) - Identity Theft.

2. The discovery in this matter contains, among other things, the personal information of numerous individuals including their tax returns, photo identifications, bank account information, and other personal identifying information ("witness discovery").

3. The parties agree that the witness discovery will be provided subject to the following conditions:

A. Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure and 28

1 U.S.C. § 1651, unauthorized disclosure of witness discovery material and information contained therein  
2 to non-litigants is prohibited.

3 B. All materials provided as witness discovery which is or was produced by the  
4 government in preparation for or in connection with any stage of the proceedings in this case, remains  
5 the property of the United States. All such materials and all copies made thereof shall be returned to the  
6 United States Attorney's Office, Tax Division unless otherwise ordered by the Court or agreed upon by  
7 the parties, at the occurrence of the last of the following:

- 8 - the completion of all appeals, habeas corpus proceedings, clemency or pardon  
9 proceedings, or other post-conviction proceedings;
- 10 - the conclusion of the sentencing hearing; or
- 11 - the earlier resolution of charges against the defendant.

12 C. Such materials provided by the United States may be utilized by the defendant  
13 solely in connection with the defense of this case and for no other purpose and in connection with no  
14 other proceeding.

15 D. Such materials and their contents, and any notes or other record of such materials  
16 or their contents, shall not be disclosed either directly or indirectly to any person or entity other than the  
17 Defendant, persons employed to assist in the defense or prosecution of this matter, or such other persons  
18 as to whom the Court may expressly authorize disclosure upon proper motion.

19 E. Such materials shall not be copied or reproduced except as necessary to provide  
20 copies of the material for use by an authorized person as described above to prepare and assist in the  
21 defense or prosecution of this matter, and all such copies and reproductions shall be treated in the same  
22 manner as the original matter. Certain documents include information private to the government's  
23 witnesses and are made available to the Defendant only as a result of the above strict guidelines.

24 F. Before any such disclosure to the Defendant, defendant's counsel shall personally  
25 inform the Defendant of the provisions of this order and direct him not to disclose any information  
26 contained in the government's discovery in violation of this order, and shall inform her or him that any  
27 unauthorized disclosure may be punished as contempt of court.

28 G. The Defendant shall be responsible for controlling and accounting for all such

1 material, copies, notes, and other records described above, and shall be responsible for assuring full  
2 compliance by himself/herself and any person assisting in his defense with this order. Written  
3 certification of such compliance shall be made to the Court at the time discovery materials are returned  
4 to the United States.

5 H. The provisions above are not meant to limit use of information provided in  
6 discovery from being used in pretrial proceedings, investigation, motions and briefs, trial and other  
7 proceedings in this litigation, unless the discovery information is protected by another protective order.

8 WHEREFORE, in the best interests of the administration of justice and because of the  
9 importance of protecting potential witnesses and others, it is requested that a protective order as  
10 described above be entered in this case.

11 Respectfully submitted,

12 MELINDA HAAG  
13 United States Attorney

14 DATED: 1/28/2015

\_\_\_\_\_/s/\_\_\_\_\_  
15 THOMAS MOORE  
16 Assistant United States Attorney  
Chief, Tax Division

17 DATED: 1/28/2015

\_\_\_\_\_/s/\_\_\_\_\_  
18 SHAFFY MOEEL  
19 Attorney for Defendant Paul Lamont Lee  
20  
21  
22  
23  
24  
25  
26  
27  
28

MELINDA HAAG (CABN 132612)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

THOMAS MOORE (ALBN 4305-O78T)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7017  
FAX: (415) 436-7009

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 14-00131 JST
	)	
Plaintiff,	)	<del>{proposed}</del> ORDER
	)	
v.	)	
	)	
PAUL LAMONT LEE,	)	
	)	
Defendant.	)	

In accordance with the parties' stipulation regarding the protective order, IT IS SO ORDERED.

DATED: January 28, 2015

